

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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JOSEPH WASHINGTON, ST. CLAIR
BLACKETT, LUCILLE MASON AND
MELISSA TROTMAN on behalf of
themselves and all others similarly
situated, : No. 16-CV-03948 (ENV) (SMG)
Plaintiffs, :
-against- :
UNITED STATES DEPARTMENT OF
HOUSING AND URBAN DEVELOPMENT :
(HUD), JULIAN CASTRO IN HIS OFFICIAL :
CAPACITY AS SECRETARY OF HUD, :
EDWARD GOLDING IN HIS OFFICIAL :
CAPACITY AS COMMISSIONER OF THE :
FEDERAL HOUSING ADMINISTRATION, :
CALIBER HOME LOANS, INC., AND U.S. :
BANK TRUST, N.A., AS TRUSTEE FOR :
LSF9 MASTER PARTICIPATION TRUST, :
Defendants. :
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**DECLARATION OF DAWN ETCHISON IN SUPPORT OF THE CALIBER
DEFENDANTS' MEMORANDUM OF LAW IN OPPOSITION TO PLAINTIFFS'
CROSS-MOTION FOR PARTIAL SUMMARY JUDGMENT AND REPLY IN
FURTHER SUPPORT OF THEIR MOTION FOR PARTIAL SUMMARY JUDGMENT
DISMISSING PLAINTIFFS' RESPA CLAIM**

I, DAWN ETCHISON, hereby declare under the penalty of perjury as follows:

1. I am a resident of the State of California and make this declaration of my own personal knowledge of the facts stated herein.
2. Any records attached to my declaration are records that were kept in the normal and regular course of business of Caliber Home Loans, Inc. ("Caliber") and are true and correct copies of the records which are described.

3. Attached hereto as Exhibit 87 is a true and correct copy of an October 15, 2014 letter from Caliber to St. Clair Blackett and Latoya Roberts regarding the servicing of the mortgage loan, beginning with Bates number CALIBER_00000002.

4. Attached hereto as Exhibit 88 is a true and correct copy of Lucille Mason's loss mitigation application that was received by Caliber on June 29, 2015, beginning with Bates number CALIBER_00000325.

5. Attached hereto as Exhibit 89 is a true and correct copy of an August 9, 2016 letter from Elizabeth M. Lynch with enclosed documents on behalf of Lucille Mason concerning Mason's loss mitigation application, beginning with Bates number CALIBER_00000593.

6. Attached hereto as Exhibit 90 is a true and correct copy of a January 18, 2017 letter from Elizabeth M. Lynch on behalf Lucille Mason appealing a modification offer with enclosed documents, beginning with Bates number CALIBER_00013994.

7. Attached hereto as Exhibit 91 is a true and correct copy of a September 23, 2014 letter from Caliber to Joseph Washington regarding the servicing of the mortgage loan, beginning with Bates number CALIBER_00000726.

I declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the foregoing is true and correct to the best of my knowledge, information and belief.

Executed on October 10, 2018 in San Diego, California.

by:


Dawn Etchison